

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
No. 25-cv-22896-KMW**

FRIENDS OF THE EVERGLADES, INC., et al.,

Plaintiffs,

v.

KRISTI NOEM, et al.,

Defendants.

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**DEFENDANT FDEM'S PRELIMINARY
WITNESS AND EXHIBIT LIST FOR AUGUST 6, 2025 HEARING**

Defendant FDEM, by and through undersigned counsel, and pursuant to the Court's Omnibus Order (Doc. 73), hereby files its Preliminary Witness and Exhibit List for the August 6, 2025 Hearing. The witnesses and exhibits identified below are preliminarily designated and FDEM reserves the ability to supplement this information:

EXHIBIT LIST

Ex. 1	Map of Utilized Area of Dade-Collier Training and Transition Airport
Ex. 2	Jan. 17, 2025 Letter from Service to Colonel B. Bowman
Ex. 3	TDF Waste Management Plan Overview
Ex. 4	Mar. 19, 2019 Bat Study
Ex. 5	Rare Snake Sightings
Ex. 6	E.O. 25-120
Ex. 7	E.O. 23-03

Ex. 8	Jul. 10, 2025 X post of @billmelugin_
Ex. 9	Jul. 10, 2025 X post of @billmelugin_
Ex. 10	Jul. 10, 2025 X post of @billmelugin_
Ex. 11	Airport Schematic
Ex. 12	Google Earth Imagery of Pre-Construction
Ex. 13	Aerial View of Parking Lot Plat
Ex. 14	Flight Logs from Jan. 1, 2025 to July 23, 2025
Ex. 15	Picture of New Main Roads
Ex. 16	Picture of Main Gate Fence
Ex. 17	Tent Expansion Area Satellite Image from 2024
Ex. 18	Picture of Standard Fence
Ex. 19	Picture of West Side Gate Fence
Ex. 20	Picture of Additional Fencing
Ex. 21	Picture of North Side Gate Fence
Ex. 22	July 22, 2025 Soil Survey
Ex. 23	Aerial of Silt Fencing
Ex. 24	Memo. of Agreement between ICE and DHS (Feb. 13, 2025)
Ex. 25	June 23, 2025 Letter from K. Guthrie to Hon. Daniella Levine Cava
Ex. 26	Picture of Fence 2011
Ex. 27	Picture of Gate 2011
Ex. 28	Memo. of Agreement between ICE and FHP (Feb. 7, 2025)
Ex. 29	Aerial of Full Airport

Ex. 30	Decl. of T. Giles (July 2, 2025)
Ex. 31	Decl. of I. Gadea-Gudicelli (July 21, 2025)
Ex. 32	Decl. of I. Gadea-Gudicelli (Aug. 2, 2025)
Ex. 33	Aerial of Mid-Airport Area
Ex. 34	Aerial of Parking Lot Area
Ex. 35	Phase One Overviews – Site Plans
Ex. 36	Picture of TNT Gate
Ex. 37	Picture of Gate
Ex. 38	Picture of Fencing (1)
Ex. 39	Picture of Fencing (2)
Ex. 40	Picture of Fencing (3)
Ex. 41	Picture of Fencing (4)
Ex. 42	Picture of Fencing (5)
Ex. 43	Picture of Fencing (6)
Ex. 44	Decl. of D. Richardson (July 2, 2025)
Ex. 45	Zoom In of Panther Telemetry
Ex. 46	Zoom Out of Panther Telemetry
Ex. 47	Site Plan Overview
Ex. 48	Aerial of Taxiway Area
Ex. 49	Aerial of Turnaround Area
Ex. 50	Aerial of West Service Road Area
Ex. 51	Aerial of West Service Road Extensions

Ex. 52	Aerial of Y Split Area (Zoomed In)
Ex. 53	Aerial of Y Split Area (Zoomed Out)
Ex. 54	<i>Eve Samples: Who I am and what I believe in</i> (Jan. 6, 2017), https://www.tcpalm.com/story/opinion/columnists/eve-samples/2017/01/06/eve-samples-who-am-and-what-believe/96217292/
Ex. 55	<i>Trump Administration Denies Protection to Six More Imperiled Species Trump on Track for Worst Presidential Record on Endangered Species Listings</i> (Aug. 14, 2019), https://biologicaldiversity.org/w/news/press-releases/trump-administration-denies-protection-six-more-imperiled-species-2019-08-14/
Ex. 56	Friends of the Everglades Board of Directors, https://www.everglades.org/board-of-directors-staff/
Ex. 57	Kautz 2025 - Impacts of the Big Cypress Detention Center on the Florida Panther and Its Habitat
Ex. 58	Kautz, R. S., et al. 2006. How much is enough? Landscape-scale conservation for the Florida panther. <i>Biological Conservation</i> 130:118–133.
Ex. 59	Memo. from T. Roberts to C. Rodriguez re Everglades Detention Center Preliminary Ecological Assessment (Aug. 4, 2025)
	All exhibits listed by any other party
	All documents used only for impeachment

WITNESS LIST

1	Ian Gadea-Guidicelli
2	Dave Kerner
	Any witness disclosed by another party

Dated: August 4, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on August 4, 2025, I electronically filed this document with the Clerk of Court using the Court's CM/ECF system, which will send a notice of docketing activity to all parties who are registered through CM/ECF.

/s/ Jesse Panuccio